

# SARACHEK LAW

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January 22, 2025

**By ECF**

Hon. Margaret M. Garnett  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2102  
New York, NY 10007  
Email: GarnettNYSDChambers@nysd.uscourts.gov

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**RE: Shin v. Kim, Case No. 1:24-cv-04293-MMG:**  
**Letter Requesting Clarification Deadlines and Adjournment of Conference**

Dear Judge Garnett:

The Sarachek Law Firm, representing plaintiff Julia Shin in connection with the above-captioned matter, respectfully submit this letter for the purposes of 1) clarifying the remaining deadlines and conferences as elaborated in the Court's September 16, 2024 case management order (the "CMO," ECF 14), as well as, 2) adjourning the February 18, 2024 pre-trial conference. Defendant does not oppose the requests herein.

According to the CMO, a number of discovery deadlines are coming due over the coming days. For example, parties are supposed to meet for a 1-hour settlement videoconference by January 22, 2025. Parties are also supposed to make expert testimony disclosures by February 7, 2025, and be completing expert discovery by March 7, 2025. Furthermore, an in-person, pre-trial status conference is set for February 18, 2025 at 11:30 am, to discuss any pending summary judgment motions.

In our December 10, 2024 teleconference with the Court, Your Honor made it clear that the outstanding discovery deadlines are now moot, given the Defendant's pending Motion to Dismiss (ECF 18, 28). The parties agree, and respectfully request this clarification on the docket – that future discovery deadlines are suspended, pending the outcome of the motion to dismiss. The parties further request that the February 18, 2025 in-person conference be taken off the calendar, given the current procedural posture. Plaintiff's counsel is also out of state that week: if the Court maintains the conference, Plaintiff requests that the conference be telephonic.

On December 10, 2024, the Court entered an Order setting out certain document discovery deadlines (Dkt. No. 46), which had been discussed during the conference of the same date. Those deadlines remain in effect and supersede the deadlines set by the September 16 Case Management Order (Dkt. No. 14), including Paragraph 2(a) of that Order, although counsel are of course encouraged to continue discussing the prospect of settlement. All other dates in the September 16 Order are suspended or adjourned pending the resolution of the motion to dismiss, including the February 18 conference. The Clerk of Court is respectfully directed to terminate Dkt. No. 47.

SQ ORDERED. Date: 1/22/2025.

  
HON. MARGARET M. GARNETT  
UNITED STATES DISTRICT JUDGE

Sincerely,

/s/ Zachary E. Mazur  
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